

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMERICAN BROADCASTING  
COMPANIES, INC. ET AL.,

Plaintiffs,

v.

AEREO, INC.,

Defendant.

Civil Action No. 12-Civ-1540 (AJN)  
(Consolidated)

WNET ET AL.,

Plaintiffs,

v.

AEREO, INC.

Defendant.

Civil Action No. 12-Civ-1543 (AJN)  
(Consolidated)

**JOINT MOTION FOR ENTRY OF  
STIPULATION AND PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c), Defendant Aereo, Inc. (“Aereo”) hereby submits this motion for entry of the Stipulation and Protective Order attached hereto as Exhibit A.

In support of this motion, the Parties state that a third party subpoena for the deposition of The Nielsen Company (“Nielsen”) was served by Aereo on February 15, 2013 in this matter, and re-served on October 18, 2013. The Parties agreed to extend the time for the deposition to be taken, so that Nielsen and the Parties could negotiate the terms of the taking of such a deposition, and potential limitations on the extent of the discovery. Now, in anticipation of the upcoming deposition of third-party Nielsen in this matter, which is currently scheduled for December 10, 2013, the Parties and Nielsen have jointly agreed to the terms of a Stipulation and Protective Order to facilitate the discovery of information from third-party Nielsen while adequately protecting Nielsen’s confidential material information and respecting the legal interests that Nielsen has asserted.

Accordingly, the Parties respectfully request that the Court grant the foregoing assented-to motion and enter the Stipulation and Protective Order attached hereto as Exhibit A. Because Nielsen has requested that this Order enter prior to the taking of any testimony, the Parties request that the Court enter this Order as soon as possible, so that the deposition may proceed as currently scheduled on December 10, 2013.

Dated: December 4, 2013

Respectfully submitted,  
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Dated: December 4, 2013

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document and any attachments are being filed through the Court's electronic filing system on December 4, 2013, which serves counsel for all parties who are registered participants as identified on the Notice of Electronic Filing (NEF). I further certify that a copy of the foregoing document and any attachments was served on counsel for The Nielsen Company via electronic mail on December 4, 2013.

/s/ R. David Hosp

R. David Hosp